

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LUXOTTICA GROUP S.P.A., OAKLEY, INC.,
AND COSTA DEL MAR, INC.,

Plaintiffs,

v.

MINGTIANN, et al.,

Defendants.

Case No. 24-cv-00018

Judge Jeremy C. Daniel

Magistrate Judge Gabriel A. Fuentes

DECLARATION OF JUSTIN R. GAUDIO

I, Justin R. Gaudio, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiffs Luxottica Group S.p.A., Oakley, Inc., and Costa Del Mar, Inc. (collectively, "Plaintiffs"). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. I hereby certify that the Defaulting Defendants (as defined in the accompanying Memorandum) have failed to answer or otherwise plead in this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A).
3. My office investigated the infringing activities of the Defaulting Defendants, including attempting to identify the owner of each associated ecommerce store operating under the Seller Aliases and its contact information. Our investigation confirmed that the Defaulting

Defendants are primarily domiciled in China. As such, I am informed and believe that the Defaulting Defendants are not active-duty members of the U.S. armed forces.

4. Attached hereto as **Exhibit 1** are a true and correct copies of screenshots of certain Domain Names that continue to operate to sell or offer for sale Counterfeit Products.
5. **Exhibit 2** is an accurate copy of unpublished decisions cited in the corresponding Memorandum in Support of Plaintiffs' Motion for Entry of Default and Default Judgment as to all Remaining Defendants with the Exception of Defendant No. 87.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 27th day of February 2024 at Chicago, Illinois.

/s/ Justin R. Gaudio
Justin R. Gaudio
Counsel for Plaintiffs Luxottica Group S.p.A.,
Oakley, Inc., and Costa Del Mar, Inc.